

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

EXPRESS MOBILE, INC.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 6:20-cv-00804-ADA

**SUPPLEMENTAL DECLARATION OF EMILY H. CHEN IN SUPPORT OF
DEFENDANT GOOGLE LLC'S REPLY IN SUPPORT OF OPPOSED MOTION TO
TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Emily H. Chen, declare under 28 U.S.C. § 1746:

1. I am an attorney licensed to practice law in the State of California and am an associate with the law firm of Desmarais LLP, counsel for Defendant Google LLC ("Google") in this action. I previously executed a declaration on January 25, 2021 in support of Google's Motion to Transfer. I make this supplemental declaration in support of Google's Reply in Support of its Motion to Transfer. I have personal knowledge of the facts set forth herein, or I am informed and believe that they are true. If called as a witness, I could and would testify competently as to these facts.

2. Attached to this declaration as **Exhibit 26** is a true and correct copy of <https://elliscotx.maps.arcgis.com/apps/webappviewer/index.html?id=c6c9f528c12d4af3ba106ca283ad5ace>, showing that Midlothian, Texas is in Ellis County.

3. Attached to this declaration as **Exhibit 27** is a true and correct copy of <http://www.txnd.uscourts.gov/court-locator>, showing that Ellis County, Texas is in the Northern District of Texas.

4. Attached to this declaration as **Exhibit 28** is a true and correct copy of <http://oracle.com/corporate/contact/field-offices.html>, listing six offices for Oracle Corporation located in the Northern District of California, including Oakland, Pleasanton, Redwood Shores, San Francisco, San Jose, and Santa Clara offices in California.

5. Attached to this declaration as **Exhibit 29** is a true and correct copy of <https://www.att.jobs/category/technology-jobs/117/36864/1>, titled “Technology Jobs,” listing technology job offerings for AT&T Inc. in California, including in San Francisco and San Ramon.

6. Attached to this declaration as **Exhibit 30** is a true and correct copy of <https://www.apple.com/job-creation/>, stating there are 36,786 Apple Inc. employees in California and Cupertino, California as Apple’s headquarters.

7. Attached to this Declaration as **Exhibit 31** is a true and correct copy of <https://www.opentext.com/about/office-locations/usa/california-san-mateo>, showing an office of OpenText Corporation located in San Mateo, California.

8. Attached to this Declaration as **Exhibit 32** is a true and correct copy of <https://www.research.ibm.com/labs/almaden/>, discussing an IBM Research office located in San Jose, California.

9. Attached to this Declaration as **Exhibit 33** is a true and correct copy of <https://www.cisco.com/c/en/us/about.html>, showing Cisco Systems, Inc. headquarters in San Jose, California.

10. Attached to this Declaration as **Exhibit 34** is a true and correct copy of <https://www.blackberry.com/us/en/company/blackberry-office-locations>, showing BlackBerry offices in San Ramon, Martinez, and Mountain View, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I executed this declaration on March 1, 2021, in Oakland, California.

By:  _____
Emily H. Chen